

Honorable Judge Richard S. Martinez

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

JANE DOE,

Plaintiff,

vs.

THE LINCOLN NATIONAL LIFE
INSURANCE COMPANY,

Defendant.

Case No. 2:22-cv-00491-RSM

**UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANT TO ANSWER, MOVE OR
OTHERWISE PLEAD TO THE
COMPLAINT**

Note on Motion Calendar: May 5, 2022
Without Oral Argument

Defendant The Lincoln National Life Insurance Company (“Lincoln”), by and through its undersigned counsel of record, respectfully requests that the Court grant an extension of time, until June 7, 2022, to answer, move or otherwise plead to Plaintiff’s Complaint. Lincoln’s counsel has conferred with Plaintiff’s counsel about this Motion, and Plaintiff does not oppose this Motion.

In support of this motion, Lincoln states as follows:

1. Plaintiff served Lincoln with her Summons and Complaint on April 25, 2022, and Lincoln’s response to the Complaint is due on or around May 16, 2022.

2. Lincoln seeks an extension of time, up to and including June 7, 2022, within which to file its responsive pleading. The requested extension serves to allow its counsel additional time to investigate Plaintiff’s allegations and respond appropriately.

1 3. This motion is made in good faith and not for purposes of vexation, harassment, or
2 undue delay.

3 4. Lincoln's counsel has conferred with Plaintiff's counsel, and Plaintiff does not
4 oppose the requested extension.

5 WHEREFORE, Lincoln respectfully requests that the Court grant its unopposed motion
6 and extend Lincoln's time to file a response to Plaintiff's Complaint through and including June
7 7, 2022.

8 WHEREFORE, Lincoln respectfully requests that the Court grant this Motion and extend
9 the deadline to answer or otherwise plead to Plaintiff's Complaint until June 7, 2022.

10 Respectfully submitted this 5th day of May, 2022.

11 OGLETREE, DEAKINS, NASH, SMOAK
12 & STEWART, P.C.

13 By: /s/ Russell S. Buhite

14 By: /s/ Bensy Benjamin

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26 By: /s/ Mel Crawford (with permission)

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 Attorney for Plaintiff Jane Doe

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of May, 2022, I filed the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO ANSWER, MOVE, OR OTHERWISE PLEAD TO THE COMPLAINT with the Clerk of the Court via CM/ECF, who sent notification to the following:

Mel Crawford, WSBA #22930
LAW OFFICE OF MEL CRAWFORD
9425 35th Avenue NE, Suite C
Seattle, WA 98115
Telephone: (206) 694-1614
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Attorney for Plaintiff Jane Doe

- ☒ by **electronic** means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- ☐ by **mailing** a true and correct copy to the last known address of each person listed above. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Seattle, Washington.
- ☐ by **e-mailing** a true and correct copy to the last known email address of each person listed above.

SIGNED THIS 5th day of May, 2022 at Seattle, Washington.

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

By: /s/ Cheryl L. Kelley
Cheryl L. Kelley, Practice Assistant
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